

Jeffrey D. Ganz
jganz@riemerlaw.com

Steven E. Fox
sfox@riemerlaw.com

Brett J. Nizzo
bnizzo@riemerlaw.com

RIEMER & BRAUNSTEIN, LLP

Seven Times Square

New York, New York 10036

212-789-3100

*ATTORNEYS FOR 62 MADISON LENDER, LLC AND
NOMAD MEZZ LENDING, LLC*

Hearing Date:
Hearing Time:

August 31, 2011
2:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re

Chapter 11

MADISON HOTEL, LLC,

Case No. 11-12560 (MG)

Debtor.

-----X

In re

Chapter 11

MADISON HOTEL OWNERS, LLC,

Case No. 11-12334 (MG)

Debtor.

-----X

**NOTICE OF MOTION OF 62 MADISON LENDER, LLC
AND NOMAD MEZZ LENDING, LLC FOR ORDER
PURSUANT TO BANKRUPTCY RULE 2004 DIRECTING
THE EXAMINATION OF AND PRODUCTION OF
DOCUMENTS BY CHAIM COHEN**

PLEASE TAKE NOTICE that on August 11, 2011, 62 Madison Lender, LLC (“62 Madison”) and Nomad Mezz Lending, LLC (“Nomad”, and together with 62 Madison, the “Senior Lenders”), filed the annexed Motion (the “Motion”) seeking the issuance and entry of an order pursuant to Fed.R.Bankr.P. 2004, inter alia, directing the examination of, and production of documents by Chaim Cohen (“Cohen”).

PLEASE TAKE FURTHER NOTICE that the Senior Lenders will move before the Honorable Martin Glenn in the United States Bankruptcy Court for the Southern District of New York, located at Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on August 31, 2011, at 2:00 p.m. or as soon thereafter as counsel may be heard, seeking the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion must be in writing, state with particularity the reasons underlying such objection, and be served on the undersigned counsel to the Senior Lenders in accordance with the time, form, and substance requirements of the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT IN THE MOTION.

Dated: August 11, 2011
New York, New York

Respectfully submitted,

RIEMER & BRAUNSTEIN LLP
*Counsel to 62 Madison Lender, LLC and
Nomad Mezz Lending, LLC*

By: /s/ Jeffrey D. Ganz
Jeffrey D. Ganz
Steven E. Fox
Brett J. Nizzo
Times Square Tower
Seven Times Square, Suite 206
New York, New York 10036
Tel.: (212) 789-3100

1362219.1